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February 2, 1010

Section 26-141b-1 to 26-141b-8

Mr. Paul E Stacey
Department of Environmental Protection
Bureau of Water Protection and Land Reuse
Planning and Standards Division
79 Elm Street
Hartford, CT 06106-5127

Dear Mr. Stacey,

This letter is submitted to the Connecticut Department of Environmental Protection on behalf of The Stanwich Club in Greenwich, Connecticut. It has been brought to our attention that the DEP is proposing to significantly reduce the amount of water allowed through our current Individual Water Diversion Permit which allows us to use 250,000 gallons per day on our golf course. That amount allows us just enough water to keep our greens, tees, and fairways alive during the dry part of the summer. Any reduction in that amount will not be enough water to adequately protect our large investment in these fine turfgrasses. If our approved allotment is reduced significantly we would be forced to irrigate only greens and tees and allow our fairway turf to die in the heat of the summer.

During the past couple of decades, golf course fairways have evolved into an intensely manicured part of the golf course, comprised of the same grasses as greens and tees (bentgrass, poa annua) and considered just as important. Our club has spent hundreds of thousands of dollars to establish and maintain our fairways which constitutes of 23 acres of turf. For instance, large outlays of capital funds are spent for sophisticated mowing equipment and computer operated, efficient irrigation systems and tens of thousands of dollars are spent annually on plant growth regulators, pest controls, fertilizers, etc. As a Certified Golf Course Superintendent, I am a highly skilled well educated professional who takes my job very seriously and consistently maintains these fine playing surfaces in an environmentally responsible fashion, which also includes very prudent, judicious use of irrigation water.

As you can see, we have a lot at stake here and a keen interest in keeping our fairways alive for the enjoyment of the game of golf with regard to esthetics and playability. If the fairways are not irrigated during hot summer weather, much of the grass will die. It is not like the Kentucky bluegrasses, Fescues and Rye grasses in the roughs or on your home lawns, which have the capacity to go dormant during droughty weather. This short cut, hybrid turf needs some irrigation to survive, otherwise its demise during drought will result in the need for a disruptive, ugly, expensive (\$10,000's) re-establishment of the turf which is a potential outcome if this new legislation is allowed to pass.

Furthermore, in the unfortunate case of widespread loss of fairway turf resulting from drought, negative golfer reactions would severely damage the economy of not only our club but all golf clubs, which are big business in the State of Connecticut. Collectively the clubs pay millions in taxes, create thousands of jobs, provide recreation for thousands of families and spend millions on goods and services in their local communities. It is extremely important to all of us that we protect the health of our greatest asset, the golf course.

In closing, it is our hope that The Stanwich Club and all golf courses in the State of Connecticut be able to maintain the 250,000 gallon/day allotment of irrigation water permitted to maintain their valuable golf course turf.

Sincerely yours,

Scott E. Niven CGCS

Property Manager

cc: The Honorable M. Jodi Rell, Governor Executive Office of the Governor State Capital Hartford, CT 06106

cc: The Honorable Amey Marrella, Commissioner
 Department of Environmental Protection
 79 Elm Street
 Hartford, CT 06106